

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
NATIONAL FORGE COMPANY, <i>et al.</i>	)	
	)	
Debtor.	)	
	)	
OFFICIAL COMMITTEE OF	)	
UNSECURED CREDITORS OF	)	
NATIONAL FORGE COMPANY,	)	
	)	
Plaintiff	)	
	)	
And	)	
	)	
OFFICIAL COMMITTEE OF RETIREES	)	
OF NATIONAL FORGE COMPANY,	)	
	)	
Intervenors	)	
	)	C.A. No. 04-21 ERIE
v.	)	
	)	
E. ROGER CLARK, <i>et al.</i>	)	
	)	
Defendants	)	

**JOINT MOTION TO EXTEND DEADLINES IN THE CASE MANAGEMENT ORDER**

AND NOW, come Plaintiff, Intervenors and Defendants, by and through their respective undersigned counsel, and hereby move, pursuant to Fed.R.Civ.P. 16(b) and Local Rule LR 16.1.2.F, to Extend Deadlines in the Case Management Order.

1. On July 18, 2005, Defendants filed a Motion for Summary Judgment and a supporting Brief in response to Plaintiff's Complaint.

2. On July 29, 2005, this Court entered a Case Management Order (the "CMO") scheduling the deadlines to which the parties were to adhere. The CMO directed the parties to move to amend their pleading/add new parties by August 15, 2005; to complete discovery on or

before October 6, 2005; and to file dispositive motions on or before January 6, 2006 and any responses thereto by January 26, 2006.

3. On August 17, 2005, this Court entered an Order granting Plaintiff's Motion for Leave to File an Amended Complaint. Plaintiff filed its Amended Complaint on August 22, 2005.

4. On August 22, 2005, Plaintiff filed its Response to the Motion for Summary Judgment of Defendants and a Brief in support.

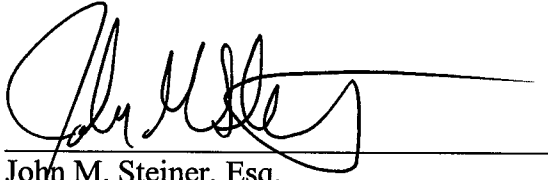
5. On September 7, 2005, this Court entered an Order ("the Order") granting the Defendants' Joint Motion for an Order Allowing Them to Withdraw Their Motion for Summary Judgment and Fixing the Date to Plead to the Amended Complaint.

6. The Order extended the time within which Defendants were to plead to Plaintiff's Amended Complaint to September 26, 2005. It further provided that in the event the Defendants move for summary judgment, Plaintiff shall have until October 17, 2005 to respond thereto and Defendants shall have until October 31, 2005 to file any sur-reply.

7. In light of the procedural posture and the extensions granted subsequent to this Court's initial CMO, the above-named parties hereby request that this Court modify the CMO to extend by 120 days all the deadlines provided therein, except the August 15, 2005 deadline regarding amending pleadings/adding new parties.

WHEREFORE, Plaintiff, Intervenor and Defendants jointly request that this Court enter a Modified Case Management Order in substantially the form of the proposed Modified Case Management Order attached hereto.

Respectfully submitted,



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R. Simons, Glenn E. Turk, Ronald L. Young,  
Barry Zischkau

Respectfully submitted,

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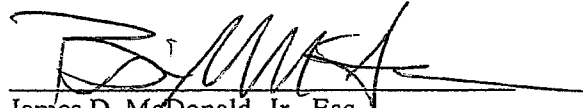
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